

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :  
SCOTT LEE KRUMRINE : CASE NO. 1:23-bk-02546-HWV  
aka SCOTT L. KRUMRINE :  
Debtor : CHAPTER 13  
:  
KITSAP CREDIT UNION :  
Movant :  
:  
v. :  
:  
SCOTT LEE KRUMRINE :  
aka SCOTT L. KRUMRINE :  
Respondent :  
:

DEBTOR'S RESPONSE TO MOTION OF  
KITSAP CREDIT UNION  
FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, comes Debtor, Scott Lee Krumrine, by and through his attorney, Gary J. Imblum, and respectfully responds as follows:

1. Admitted.
2. Admitted in part and denied in part. The Loan Agreement speaks for itself. Strict proof is demanded.
3. Admitted in part and denied in part. Debtor's Chapter 13 Plan provides for payment in full through the Chapter 13 Trustee.
4. Admitted in part and denied in part. Debtor's Chapter 13 Plan provides for payment in full through the Chapter 13 Trustee.
5. Admitted.
6. Admitted.
7. Admitted in part and denied in part. The debt secured by the vehicle is being paid in full through the Chapter 13 Plan.

8. Admitted in part and denied in part. Debtor has no knowledge as to the exact payoff. Strict proof is demanded. Further, the vehicle is being paid off in full through the Chapter 13 Plan.

9. Denied.

10. Denied. All communications should go through Debtor's counsel.

11. Denied. There is no reason why Rule 4001(a)(4) should not apply.

**WHEREFORE**, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum  
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DATED: 6-2-25

**CERTIFICATION OF SERVICE**

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing  
DEBTOR'S RESPONSE TO MOTION OF KITSAP CREDIT UNION FOR RELIEF FROM THE  
AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class,  
postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE  
CHAPTER 13 TRUSTEE  
VIA E-SERVICE

MARIO HANYON, ESQUIRE  
BROCK & SCOTT, PLLC  
COUNSEL FOR MOVANT  
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

*Carol V. Shay*

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DATED: 6/2/2025